

MAY 12 2015

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

ERNESTO CRUZ-ROMAN

CRYSTAL BERNICE RODRIGUEZ

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Criminal No. M-15-0160-S1

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

Count One

From on or about October 30, 2014, through on or about January 30, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ERNESTO CRUZ-ROMAN
and
CRYSTAL BERNICE RODRIGUEZ**

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors to conceal, harbor, and shield from detection said aliens in any place, including any building or any means of transportation, to wit: in a residence located near Penitas, Texas.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

Count Two

From on or about October 30, 2014, through on or about January 30, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

ERNESTO CRUZ-ROMAN
and
CRYSTAL BERNICE RODRIGUEZ

knowing and in reckless disregard of the fact that Urania Elizabeth Ramos-Lizama was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Penitas, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

Count Three

From on or about December 1, 2014, through on or about January 30, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

ERNESTO CRUZ-ROMAN
and
CRYSTAL BERNICE RODRIGUEZ

knowing and in reckless disregard of the fact that Ever Armando Violante-Mendez was an alien who had come to, entered, and remained in the United States in violation of law, did knowingly conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said alien in any place, including any building or any means of transportation, to wit: in a residence located near Penitas, Texas, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).

Count Four

From on or about October 30, 2014, through on or about January 30, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

ERNESTO CRUZ-ROMAN

knowingly did provide and obtain and attempted to provide and obtain the labor and services of Urania Elizabeth Ramos-Lizama, by threats of serious harm to Urania Elizabeth Ramos-Lizama, by means of the abuse and threatened abuse of law and the legal process, and by means of a scheme, plan and pattern intended to cause Urania Elizabeth Ramos-Lizama to believe that if she did not perform such labor and services, she would suffer serious harm.

In violation of Title 18, United States Code, Sections 1589 and 1594(a).

NOTICE OF FORFEITURE
18 U.S.C. §1589

Pursuant to Title 18, United States Code, Section 1594(d), the United States gives notice to defendant,

ERNESTO CRUZ-ROMAN

that upon conviction of Count Four, a violation of Title 18, United States Code, Section 1589, (1) any property, real or personal, used or intended to be used to commit or to facilitate the commission of the respective offense; and (2) any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the respective offense are

subject to forfeiture, to include but not limited to the following:

1. 2007 White Chevrolet Avalanche, license plate TX DCV3367.

A TRUE BILL

FOREPERSON

KENNETH MAGIDSON
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY